

DECLARATION OF [REDACTED]

I, [REDACTED], make the following declaration based on my personal knowledge and declare under the penalty of perjury under the laws of the United States of America, and pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge:

1. My name is [REDACTED]. I am over the age of 18 and am competent to testify regarding the matters described below.
2. I am a citizen of El Salvador. Before I was deported, I lived in Annapolis, Maryland.
3. In 2022, I fled El Salvador because the Salvadoran police falsely accused me of belonging to a criminal organization. I entered the United States in or around July 2022.
4. In June 2022, during my journey to the United States, I traveled through Mexico where I was stopped by Mexican police and robbed. Near the U.S.-Mexico border, I was kidnapped and held for ransom by drug cartel members.
5. When I entered the United States, I was detained by immigration for 18 months. In December 2023, I won protection from an immigration judge under the Convention Against Torture (CAT) from removal to El Salvador. I was released from immigration detention in January 2024. As a condition of my release, I had to regularly report to U.S. Immigration and Customs Enforcement (ICE), which I did.
6. In early September 2025, immigration officers detained me at my ICE check-in in Baltimore, Maryland. An ICE officer told me I was going to be deported to Mexico, and I said that I was afraid of being deported to Mexico because I was kidnapped and robbed there in 2022. I also was afraid that Mexico might deport me to El Salvador because I had heard that this had happened to another Salvadoran who had won CAT protection. I told the officers about the immigration judge's order in my case.
7. After that, I spoke with an immigration officer about my fear of deportation to Mexico. I told the officer I was afraid to go to Mexico and about all the terrible things that had happened to me there in June 2022. I also told the officer that I was afraid that Mexico would send me back to El Salvador and that I had won CAT protection from deportation there.
8. ICE tried to deport me to Mexico four times. The first time was in late September 2025 in the morning. ICE officers told me I was going to be deported to Mexico. I told them that I was afraid of being sent there and had told an officer about my fear. I also told ICE officers that Mexico was going to deport me back to El Salvador and that I was scared. When they insisted that I was going to be deported to Mexico, I grabbed my Bible and laid face up on the floor. ICE officers grabbed me, broke my finger, tied me up, and hit me all over. They put me in a body constraint that I think they called the "wrap" and drove me about four hours from Florence, where I was detained at the time, to Nogales,

Arizona. When I arrived, I was crying from the pain. A Mexican immigration officer refused to accept me into the country. The ICE officers then drove me back to the detention center in Florence.

9. The next day, ICE tried to deport me to Mexico again, but the Mexican immigration officers again refused to accept me. The ICE officers again drove me back to Florence. I kept telling the officers that I was afraid of going to Mexico, but they ignored me and took me by force. When I asked them about my fear screening, they told me it was negative.
10. A few days later, they tried to deport me again, but a Mexican immigration officer again refused to accept me into the country.
11. In early October 2025, ICE again brought me to Mexico. I tried to resist by tying myself up with seatbelts, but the ICE officers beat me, sprayed gas, and cut the seatbelts. This time Mexican officers accepted me.
12. The Mexican officers transported me to Tenosique, an area in southern Mexico near the border with Guatemala, where I am currently in hiding. I am afraid that I will be kidnapped if I leave the building, just like I was before. My hand is broken, and the doctors in Mexico told me that I need to have surgery for my hand. I am terrified for my safety. I only have temporary status in Mexico while I apply for refugee status. I cannot work because my hand is broken. So, I am in hiding.

Executed on this 14th day of November 2025 at Tenosique, Tabasco, Mexico.



Certification of Translation

I, Olivia Callan, hereby certify that I am fully competent in both English and Spanish languages, that on November 14, 2025, I read the above declaration to [REDACTED] in Spanish to the best of my ability, and that he has signed his name with full understanding of its contents.


Olivia Callan